

REMARKS

The claims have not been amended. Accordingly, claims 1-19 are currently pending in the application, of which claim 1 is an independent claim.

Applicant respectfully requests reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 102

Claims 1-19 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Patent No. 6,117,529 issued to Leising, *et al.* ("Leising").

Applicant respectfully submits that the rejection of independent claim 1 is improper. A proper rejection under 35 U.S.C. § 102(b) requires that a single reference disclose every claimed feature. If the reference fails to disclose one or more claimed features, the 35 U.S.C. § 102(b) rejection is improper. Here, the rejection is improper because Leising fails to disclose every feature of claim 1.

The Office Action's rejection of claim 1 must be withdrawn because it relies upon a single feature of Leising to teach multiple limitations of claim 1. Specifically, claim 1 recites a display comprising, *inter alia*:

a first electrode having a first polarity, a second electrode having a second polarity, and an emitter layer, wherein the emitter layer is interposed between the first electrode and the second electrode;
an excitation light source for projecting light to the emitter layer;
a photoluminescence light emitted from the emitter layer...

Here, the Office Action relies upon Leising's anode layer 2, cathode layer 6, and electroluminescence layer 3 to disclose the first electrode, second electrode, and emitter layer of claim 1. The Office Action then cites column 11, lines 46-49 of Leising for disclosing the excitation light source of claim 1. However, this portion of Leising refers to blue light emitting

diodes, which "basically [consist] of the organic electroluminescence layer 3 disposed between two different electrodes (anode) 2 and (cathode) 6." (col. 10, ll 62-65). Thus, the Office Action impermissibly relies upon Leising's electroluminescence layer 3 to disclose both the emitter layer of claim 1 and the excitation light source of claim 1. Consequently, the rejection cannot be maintained.

Moreover, Leising fails to disclose every feature of claim 1. Specifically, Leising fails to disclose the excitation light source recited in claim 1. The Examiner asserts that Leising discloses an excitation light source at column 11, lines 46-49. Office Action, page 2, 6. Applicant disagrees. The excitation light source of claim 1 is "for projecting light to the emitter layer." Further, as recited in claim 1, the emitter layer is "interposed between the first electrode and the second electrode." To the contrary, in Leising, blue light emitting diodes in the electroluminescent layer 3 emit blue light that is converted into green light and red light by a color conversion layer 7. Leising, column 9, lines 54-56; column 11, lines 42-49. However, Leising's color conversion layer 7 does not correspond to claim 1's emitter layer because Leising's color conversion layer 7 is not "interposed between" electrodes 2 and 6. Thus, only Leising's blue light emitting diodes can correspond to claim 1's emitter layer.

However, if Leising's blue light emitting diodes correspond to claim 1's emitter layer, the blue light emitting diodes cannot also correspond to claim 1's excitation light source because they do not project light "to the emitter layer." Rather, Leising discloses light being emitted from the electroluminescence layer 3, which contains the blue light emitting diodes. Leising does not disclose light being emitted to the electroluminescence layer 3. Therefore, Leising fails to disclose "an excitation light source for projecting light to the emitter layer."

Finally, the display of claim 1 requires "a photoluminescence light emitted from the emitter layer" (line 8). Although the Office Action does not explicitly cite which portion of Leising discloses this feature, it impliedly relies upon the blue light emitted from the

electroluminescence layer 3. As noted above, however, this blue light is also relied upon to teach the excitation light source.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(b) rejection of claim 1. Claims 2-19 depend from claim 1 and are allowable at least for this reason. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicant respectfully submits that independent claim 1, and all the claims that depend therefrom, are allowable.

CONCLUSION

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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